



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101

MAR 03 1994

Reply To  
Attn Of: HW-113

**Subject: Middle Waterway  
Source Control Actions  
Commencement Bay Nearshore/Tideflats Superfund Site**

To Interested Parties:

The purpose of this letter is to transmit to you two recent Source Control Status Reports from the Washington Department of Ecology (Ecology) concerning Middle Waterway at the Commencement Bay Nearshore/Tideflats (CB/NT) Superfund Site, Tacoma, Washington. The enclosed reports present results of Ecology's efforts to address facilities and properties that are ongoing sources of contamination to the Middle Waterway.

This report is being provided by the U.S. Environmental Protection Agency (EPA) to all interested parties, including members of the public, community groups, Natural Resource Trustees, and owners and operators of properties or facilities near the Middle Waterway. This report may be of interest to you because it may contain information relevant to a property or facility associated with you.

**Background**

As outlined in the CB/NT Record of Decision (ROD) dated September 1989, EPA and Ecology are coordinating efforts to clean up contamination at the CB/NT site. The cleanup plan involves a two-phase approach that is being implemented in eight problem areas identified at the site. For each problem area, the cleanup plan requires that releases of contaminants to the marine environment be eliminated or reduced to an acceptable level. Once the sources of contaminants have been regulated, marine sediment cleanup activities will be initiated. The CB/NT ROD identifies Ecology as the lead agency for source identification and source control, and EPA as the lead agency for cleaning up contaminated marine sediments. Ecology's Commencement Bay Urban Bay Action Team (UBAT), which is part of the Toxics Cleanup Program at Ecology's Southwest Regional Office, has primary responsibilities for implementing source control at the site.

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Ecology's source control efforts at the CB/NT site initially focus on identifying the facilities or sites that may release contaminants, and determining whether those facilities or sites are potential or confirmed ongoing sources of problem chemicals to a problem area. After identifying an ongoing source, facility-specific cleanup measures are implemented to control the release of contaminants to the marine environment and to ensure compliance with environmental regulations. Source identification and source control efforts do not focus on historical sources that have already ceased discharges of contaminants to the environment, except as required by ongoing monitoring programs.

#### **Source Control Milestone 1 Letter Report**

The enclosed Milestone 1 Letter Report documents the achievement of a source control milestone in the Middle Waterway Problem Area. **Milestone 1 is achieved when all potential and confirmed ongoing sources of problem chemicals to a problem area have been identified.** The definition and implications of Milestone 1 are described in EPA's Source Control Strategy Report (May 1992; see pp. 29-31, 36, 39).

#### **Source Control Milestone 2 Letter Report**

The enclosed Milestone 2 Letter Report documents the achievement of a second source control milestone in the Middle Waterway Problem Area. **Milestone 2 is achieved when essential administrative actions (e.g., orders, permits, decrees) are in place to address all major sources of problem chemicals in a problem area.** Essential administrative actions are those actions that must be in place to ensure that major sources of problems chemicals to a problem area will be controlled so that sediment recontamination would not be expected to occur after the action is completed (i.e., after the source is controlled). Further definition and implications of Milestone 2 are described in EPA's Source Control Strategy Report (May 1992; pp. 36-40).

We would like to emphasize that Ecology's Status Reports for Source Control Milestone 1 and 2 only describe Ecology's efforts to identify, control and/or eliminate ongoing sources of problem chemicals to the Middle Waterway. Thus, the lists of facilities and sites included in the Ecology Status Reports should not be confused with EPA's list of Potentially Responsible Parties (PRPs) for Middle Waterway. EPA has identified, and will continue to identify, PRPs for the Middle Waterway based on the liability criteria set forth in CERCLA Section 107. Finally, Ecology may make separate determinations in the future about whether additional facilities or properties that are contaminated, but do not appear to be sources to the Waterway, require investigation or cleanup under the Washington State Model Toxics Control Act.

**Next Steps**

The achievement of Milestones 1 and 2 in the Middle Waterway problem area concludes an important step in the overall CB/NT cleanup strategy. At this point, source control activities have progressed sufficiently so that sediment remedial design activities could begin. Sediment remedial design sampling activities will more precisely characterize the contaminated area, including the area expected to recover through natural processes, and will determine the approximate volume to be remediated. In order to begin sediment remedial design activities in Middle Waterway, EPA must complete its identification of PRPs. We plan to complete this by Spring 1995 after which time PRPs will be notified and asked to participate in the sediment remedial design effort.

If you have any questions regarding source control activities or the enclosed Status Reports, please call me at 1-206-553-2141 or toll free at 1-800-424-4EPA.

Sincerely,



Karen Keeley  
Superfund Site Manager

Enclosures

Addressees

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Stein, Barry  
Stivers, Carl  
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Jack Carlyle  
Coast Craft Cabinets  
Cook's Marine Specialties  
Foss Maritime Co.  
Gerrish Bearing  
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Simpson Tacoma Kraft Company  
Tacoma Fire Department  
The Truss Company/McMillan Bloedel/Matheus Lumber  
Union Pacific Railroad Company  
Washington Belt & Drive Systems  
Washington Department of Natural Resources  
Western Machine Works, Inc.  
BP Oil  
Shell Oil Company